

Amended Complaint

Samuel S. Meeker, Tashawn Hunter

v.

Civil Action No.
18-CV-757

Lynn Sellers,

County of Northampton

Parties

- Ms. Sellers is the law librarian at Northampton County Prison, thus the relevant member of Northampton County Prison to bring suit against. Yet, because she has not acted maliciously or refused to aid me in any way she is being named in her official capacity.

Basis for Claim

Because Plaintiff Samuel S. Meeker is a party to an Estate pending in

Lehigh County Orphans Court, and lacks legal counsel in that matter, the material deficiencies, as stated in the complaint, have prevented Mr. Meeker from having "meaningful access" to the courts. As Civil representation is not a right in the United States, a person who is a party to a civil matter, such as an Estate of An Incapacitated Person, must be afforded adequate and reasonable facilities to conduct legal research. The lack of any writing desks, the lack of books to review in an inmates cell area and the lack of a reasonable alternative constitutes the requirements for stating a claim. Mr. Meeker was unable to access the PA Orphans

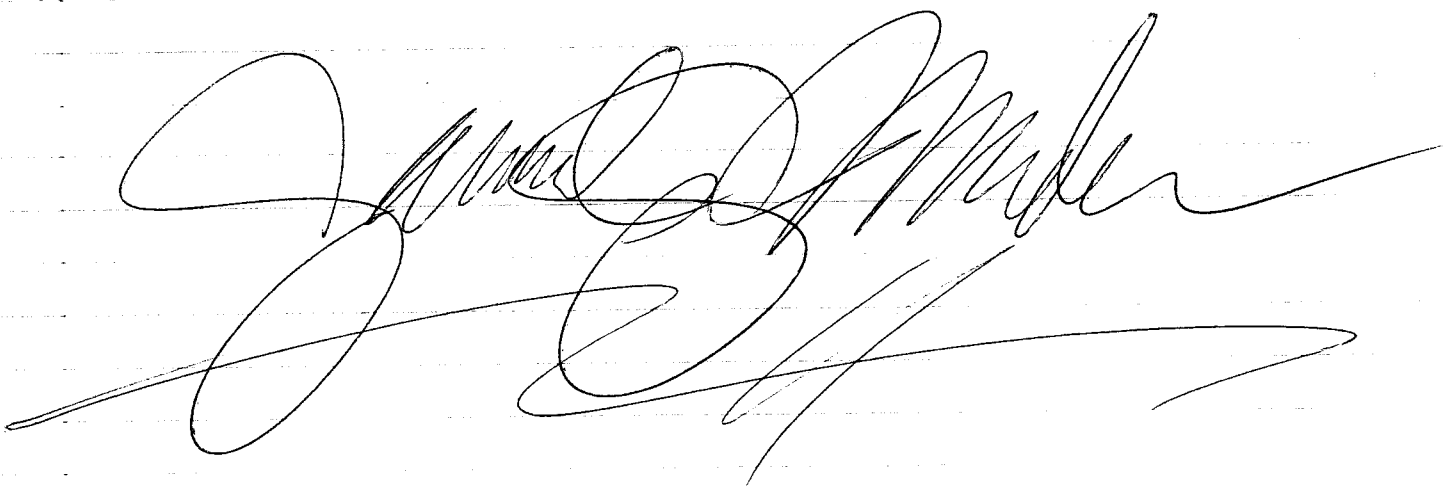
Court Rules as the terminal provided and thus his ability to know the relevant information to pursue his open civil litigation/matter was materially deficient. As such, the court ought award compensatory damages of \$15,000; which represents adequate representation in the matter he currently is a party to. The

following remedial measures are sought;

- 1) Access to a physical law library.
- 2) Reasonable writing Desks w/in that library.

- 3) Access to a copier in order to make copies for review in a prisoner's cell area and to prepare legal documents.

4) The ability to bring reference materials back to the cell for study.

A large, stylized handwritten signature in black ink. The signature is highly cursive and fluid, with large loops and a long horizontal stroke extending to the right. It appears to read 'Samuel S. Moether'.

Samuel S. Moether

6/6/18



***Lehigh County Court of Common Pleas
Orphans' Court Division
Lehigh County Courthouse
455 West Hamilton Street
Allentown, Pennsylvania 18101-1614***

Janet Thwaites, Esquire
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(610) 782-3020
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Minerva Diaz
Kathleen Newett
Megan Hutchings
Orphans' Court Auditor
Christine Fratrik

May 23, 2018

Samuel S. Meeker
Pyramid Healthcare
2705 Old Bethlehem Pike
Quakertown, PA 18951

In re: Your written request dated May 8, 2018

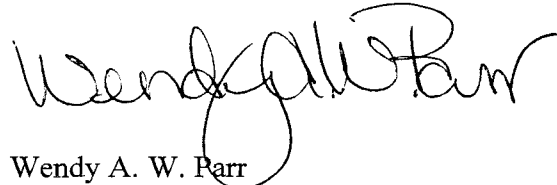
Dear Mr. Meeker:

Enclosed please find a photo copy of this Court's April 25, 2018 Order and Notice of Entry of Order along with the envelope that was returned to us as undeliverable, and a photo copy of the docket of your father's case, highlighted to show proof of filing of your Objections to the Petition to Sell Real Estate.

Orphans' Court does not have Petition Packets or fill-in -the-blank Petition forms of any kind. The State Orphans' Court Rules can be found by accessing any law library or public library's public computers at <http://www.pacourts.us/assets/opinions/Supreme/out/682spct-attach.pdf> Likewise, Lehigh County Local Orphans' Court Rules can be found at <http://www.lccpa.org/orphans/OrphansCourtRules.pdf>

Finally, your letter requested IFP, Civil Complaint and Civil Motion Packet, all of which I believe are available on the Lehigh County Court website at <http://www.lccpa.org/forms/civil/>. If you have any questions concerning Civil Division or it's forms please contact Clerk of Judicial Records – Civil Division at 610-782-3148.

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy A. W. Parr". The signature is fluid and cursive, with the first name "Wendy" being the most prominent.

Wendy A. W. Parr
Clerk of Orphans' Court Division

Enclosures

2017-1778

4/18/18

RECEIVED

APR 23 2018

Clerk of Orphans' Court Division
Lehigh County, Pennsylvania

To whom this may concern,

Please file this Response to Anthony M. Muir's petition to Approve the sale of real property related to File NO. 2017-1778 and waive all applicable fees as I am indigent and incarcerated. I have assembled some basic instruments to file this as closely to the rules as I can and if I have failed to comply w/ any local rules I ask for consideration. Please serve a copy to all relevant parties and return a time-stamped copy to me and my Attorney of Record: Anthony Ryback, Esq.

Public Defender's Office
669 Washington St. Easton, PA 18042. Thank you for your service to the court.

Respectfully,



Samuel S. Meeker

#26020

666 Walnut St.

Easton, PA 18042

CC: Henry Meeker

CC: Oliver H. Meeker

CC: File

CC: Anthony Muir, Esq.

CC: James A. Bartholomew, Esq.

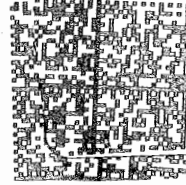
CC: Judge Reibman, P.S.

CC: Anthony Ryback, Esq.

PYRAMID HEALTHCARE
2705 OLD BETHLEHEM PIKE
QUAKERTOWN, PA 18951

Samuel S. Neel

**U.S. 11 S.
X-RAY**



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US District Court
Attn: clerk of the court
504 West Hamilton St.
Allentown, PA 18101

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